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MG Freesites Ltd, MG Premium Ltd,
MindGeek USA Incorporated, MG Global
Entertainment Inc., and 9219-1568 Quebec
Inc.*

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

K.A.

Plaintiffs,

v.

MINDGEEK S.À R.L, et al.,

Defendants.

Case No. 2:24-cv-04786-WLH-ADS

**DEFENDANTS MINDGEEK S.À R.L.,
MG FREESITES LTD, MG PREMIUM
LTD, MINDGEEK USA
INCORPORATED, MG GLOBAL
ENTERTAINMENT INC., AND 9219-
1568 QUEBEC INC.'S CIVIL LOCAL
RULE 79-5.2.2 APPLICATION FOR
LEAVE TO FILE DOCUMENTS
UNDER SEAL**

**[Filed concurrently with Declaration of
Peter A. Biagetti; Proposed Order]**

Hearing Date: January 31, 2025
Hearing Time: 1:30 p.m.
Courtroom: 9B
Judge: Hon. Wesley L. Hsu

Complaint Filed: June 7, 2024
Trial Date: None Set

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Pursuant to Local Rule 79-5.2.2 and the Stipulated Protective Order entered by the Court on October 14, 2022, Dkt. 187, and the Amended Stipulated Protective Order entered by the Court on December 13, 2024, Dkt. 516, in the related case, *Fleites v. MindGeek S.a.r.l. et al. et al.*, Case No. 21-cv-04920-WLH-ADS, MindGeek, S.à r.l., MG Freesites Ltd, MG Premium Ltd, MindGeek USA Incorporated, MG Global Entertainment Inc., and 9219-1568 Quebec Inc. (collectively the “MindGeek Defendants”) respectfully apply for an order sealing portions of the Reply in Support of MindGeek Defendants’ Motion to Dismiss (the “Reply”).

As set forth in the accompanying Declaration of Peter A. Biagetti, the MindGeek Defendants’ Reply contains information setting forth confidential internal business practices related to content uploaded to websites owned or operated by the MindGeek Defendants that would result in harm to the MindGeek Defendants’ business and cause security and safety concerns if disclosed.

Dated: January 8, 2025

Respectfully submitted,

MINTZ LEVIN COHN FERRIS
GLOVSKY AND POPEO, P.C.

/s/ Peter A. Biagetti

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